

payment method—a debenture or a remittance coupon—are valid means to repay the loan. As the defendants note, courts routinely dismiss sovereign citizen complaints against mortgage servicers, including when, as here, the complaints involve unconventional payment methods. *See Price-Rodgers v. Compu-Link*, 2020 WL 3866667, at *3 (M.D. Ala. June 17, 2020), *report and recommendation adopted*, 2020 WL 3833087 (M.D. Ala. July 8, 2020); *Haywood v. Tex. Realator*, 2023 WL 5597346, at *2 (N.D. Tex. Aug. 7, 2023), *report and recommendation adopted*, 2023 WL 5604130 (N.D. Tex. Aug. 29, 2023).

Smith also alleges fraud, but he does not meet the heightened pleading requirement to support a valid fraud accusation. Flagstar’s motion to dismiss the complaint filed by Joseph Smith is granted. (Docket Entry No. 3). The complaint is dismissed, with prejudice, because any amendment would be futile.

SIGNED on January 23, 2024, at Houston, Texas.

A handwritten signature in black ink, reading "Lee H. Rosenthal". The signature is fluid and cursive, with a large, sweeping loop at the end of the last name.

Lee H. Rosenthal
United States District Judge